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8 As Liquidating Agent For Western Corporate Federal Credit Union

9 UNITED STATES DISTRICT COURT
10 CENTRAL DISTRICT OF CALIFORNIA

11 NATIONAL CREDIT UNION
12 ADMINISTRATION BOARD AS
13 LIQUIDATING AGENT FOR
14 WESTERN CORPORATE FEDERAL
15 CREDIT UNION,

Plaintiff,

v.

16 ROBERT A. SIRAVO, TODD M. LANE,
17 ROBERT J. BURRELL, THOMAS E.
18 SWEDBERG, TIMOTHY T. SIDLEY,
19 ROBERT H. HARVEY, JR., WILLIAM
20 CHENEY, GORDON DAMES, JAMES
21 P. JORDAN, TIMOTHY KRAMER,
ROBIN J. LENTZ, JOHN M. MERLO,
WARREN NAKAMURA, BRIAN
OSBERG, DAVID RHAMY and
SHARON UPDIKE,

Defendants.

Case No.: CV10-01597 GW (MANx)

**JOINT STIPULATION
EXTENDING TIME TO RESPOND
TO SECOND AMENDED
COMPLAINT AND SETTING
BRIEFING SCHEDULE**

RECITALS

A. Plaintiff, the National Credit Union Administration Board as Liquidator for Western Corporate Federal Credit Union ("NCUA") filed a Second Amended Complaint in this action on February 22, 2011.

B. Pursuant to Federal Rules of Civil Procedure, Rule 15(a) the time for defendants to respond to the Second Amended Complaint is March 8, 2011.

C. Several of the defendants intend to file motions to dismiss some or all of the claims set forth in the Second Amended Complaint. Counsel for defendants expect to file, collectively, at least three separate motions to dismiss, plus joinders in each others' motions.

D. To allow each of the parties sufficient time to prepare the motions, oppositions and replies thereto, the have agreed on a briefing schedule.

E. The parties have selected June 9, 2011, as a hearing date. The date was selected in an attempt to accommodate multiple business and personal conflicts, including previously scheduled vacations over differing Spring Break holidays that would otherwise conflict various counsel's times for briefing the anticipated motions.

STIPULATION

Based on the foregoing, NCUA and all defendants through their respective counsel hereby stipulate as follows and respectfully request that this Stipulation be made an order of the Court (a [Proposed] Order is attached):

1. Defendants, and each of them, may have to and including April 18, 2011 to file their responses to the Second Amended Complaint.

2. The briefing schedule for any motion to dismiss filed in response to the Second Amended Complaint shall be briefed and heard on the following schedule:

a. Any oppositions shall be served and filed by May 12, 2011.

b. Replies shall be served and filed by May 26, 2011.

c. The hearing on the motions shall be June 9, 2011.

d. The Court shall set a date for a Scheduling Conference in this matter at the hearing on June 9, 2011.

DATED: March 10, 2011 LUCE, FORWARD, HAMILTON & SCRIPPS LLP
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MICHAEL E. PAPPAS

By: /s/ Michael H. Bierman
Michael H. Bierman
Attorneys For The National Credit Union
Administration Board As Liquidating Agent
For Western Corporate Federal Union

DATED: March 10, 2011 PILLSBURY WINTHROP SHAW PITTMAN LLP
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GEORGE ALLEN BRANDT

By: /s/ Bruce A. Ericson
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Harvey, Jr., James Jordan, Timothy M.
Kramer, Robin Lentz, John M. Merlo, Warren
Nakamura, Brian Osberg, David Rhamy and
Sharon Updike

DATED: March 10, 2011 ORRICK, HERRINGTON & SUTCLIFFE LLP
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ANDREW S. WONG
SETH E. FREILICH

By: /s/ Seth E. Freilich
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1 DATED: March 10, 2011

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